

**UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD  
BEFORE ADMINISTRATIVE LAW JUDGE LAUREN ESPOSITO**

LEWIS FOODS OF 42ND STREET, LLC A  
McDONALD'S FRANCHISEE, AND  
McDONALD'S USA, LLC, JOINT  
EMPLOYERS, et al.

Case Nos. 02-CA-093893, et al.  
04-CA-125567, et al.  
13-CA-106490, et al.  
20-CA-132103, et al.  
25-CA-114819, et al.  
31-CA-127447, et al.

and

FAST FOOD WORKERS COMMITTEE AND  
SERVICE EMPLOYEES INTERNATIONAL  
UNION, CTW, CLC, et al.

**REQUEST OF BERLIN ROSEN, LTD. TO JOIN MOTION FOR PROTECTIVE ORDER  
FILED BY CHARGING PARTY SEIU**

Berlin Rosen, Ltd. ("Berlin Rosen"), a nonparty to this proceeding that has been served with a subpoena *duces tecum* by charged party McDonald's USA, LLC ("McDonald's"), hereby joins the motion for protective order filed by charging party Service Employees International Union ("SEIU").

Although Berlin Rosen has not had an opportunity to review the documents that are responsive to the broad subpoena that respondent McDonald's served on it one week ago, it knows that it is likely to possess materials in the same protected categories as those identified by SEIU in its motion for a protective order. That is because SEIU shared certain sensitive information with Berlin Rosen pursuant to the terms of a confidentiality clause in the contract between SEIU and Berlin Rosen. Berlin Rosen therefore is likely to be in possession of copies of many of the same materials that SEIU is seeking to protect in its motion.

Because the grounds in support of SEIU's motion apply equally to Berlin Rosen, and because it would be cumbersome and inefficient to have a multiplicity of different protective orders in place for this litigation, Berlin Rosen requests that SEIU's motion be granted and the proposed protective order appended to that motion be made applicable to all discovery, including third-party discovery, in this matter.

Respectfully submitted,

/s/ Leon Dayan

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